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Proposed Counsel to the Debtors
and Debtors in Possession

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

- - - - - X
In re: : Chapter 11
:
Circuit City Stores, Inc., : Case No. 08-35653 (KRH)
et al., :
:
Debtors. : Jointly Administered
- - - - - X

**MOTION OF THE DEBTORS FOR ORDER PURSUANT TO BANKRUPTCY
RULE 1007(C) AND LOCAL BANKRUPTCY RULE 1007-1 EXTENDING
TIME FOR DEBTORS TO FILE THEIR SCHEDULES AND STATEMENT
OF FINANCIAL AFFAIRS AND LIST OF EQUITY SECURITY HOLDERS**

The debtors and debtors in possession in the
above-captioned cases (collectively, the "Debtors")¹

¹ The Debtors and the last four digits of their respective taxpayer identification numbers are as follows: Circuit City Stores, Inc. (3875), Circuit City Stores West Coast, Inc.

hereby move (the "Motion") this Court for entry of an order, under Rule 1007(a) and (c) of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules") and Rule 1007-1 of the Local Bankruptcy Rules of the United States Bankruptcy Court for the Eastern District of Virginia (the "Local Bankruptcy Rules"), extending the deadline by which the Debtors must file their schedules of assets and liabilities (the "Schedules"), their statements of financial affairs (the "SOFAs"), and the list of equity security holders for Circuit City Stores, Inc. (the "Equity List") by 35 days. In further support of the Motion, the Debtors respectfully represent:

JURISDICTION AND VENUE

1. This Court has jurisdiction to consider this Motion under 28 U.S.C. §§ 157 and 1334. This is a core proceeding under 28 U.S.C. § 157(b). Venue of

(0785), InterTAN, Inc. (0875), Ventoux International, Inc. (1838), Circuit City Purchasing Company, LLC (5170), CC Aviation, LLC (0841), CC Distribution Company of Virginia, Inc. (2821), Circuit City Properties, LLC (3353), Kinzer Technology, LLC (2157), Abbott Advertising Agency, Inc. (4659), Patapsco Designs, Inc. (6796), Sky Venture Corp. (0311), Prahs, Inc. (n/a), XSStuff, LLC (9263), Mayland MN, LLC (6116), Courchevel, LLC (n/a), Orbyx Electronics, LLC (3360), and Circuit City Stores PR, LLC (5512). The address for Circuit City Stores West Coast, Inc. is 9250 Sheridan Boulevard, Westminster, Colorado 80031. For all other Debtors, the address is 9950 Mayland Drive, Richmond, Virginia 23233.

these cases and this Motion in this district is proper under 28 U.S.C. §§ 1408 and 1409.

2. The legal predicates for the relief requested herein are Bankruptcy Rule 1007(a) and (c) and Local Bankruptcy Rule 1007-1.

BACKGROUND

3. On November 10, 2008 (the "Petition Date"), the Debtors filed voluntary petitions in this Court for relief under chapter 11 of the Bankruptcy Code. The factual background regarding the Debtors, including their business operations, their capital and debt structure, and the events leading to the filing of these bankruptcy cases, is set forth in detail in the Declaration of Bruce H. Besanko, Executive Vice President and Chief Financial Officer of Circuit City Stores, Inc., in Support of Chapter 11 Petitions and First Day Pleadings (the "Besanko Declaration"), which is fully incorporated herein by reference.²

² Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Besanko Declaration.

4. The Debtors continue to manage and operate their businesses as debtors in possession pursuant to Bankruptcy Code sections 1107 and 1108.

5. No trustee or examiner has been appointed in these chapter 11 cases, and no committees have yet been appointed or designated.

RELIEF REQUESTED

6. By this Motion, the Debtors request that the Court enter an order, substantially in the form attached hereto, extending the deadline to file their Schedules, SOFAs, and Equity List by 35 days, from November 25, 2008, the date such Schedules and SOFAs are otherwise required to be filed under Bankruptcy Rule 1007(c), through and including December 30, 2008.

BASIS FOR RELIEF

7. Under Bankruptcy Rule 1007, a debtor ordinarily would be required to file its Schedules, SOFAs, the Equity List no later than 15 days after the Petition Date.

8. Further, under Local Bankruptcy Rule 1007-1(b), where there are more than thirty creditors in the case, the debtor need only provide notice of its

motion to extend time to the ten largest secured creditors, the twenty largest unsecured creditors, and any official committee appointed in the case.

APPLICABLE AUTHORITY

9. Under Bankruptcy Rule 1007(c), the Debtors may obtain a further extension of the Schedules Deadline for cause shown. See Fed. R. Bankr. P. 1007(c) ("Any extension of time for the filing of the schedules and statements may be granted only on motion for cause shown and on notice."). Moreover, Local Bankruptcy Rule 1007-1(c) provides:

Where no objections to the motion to extend time are timely filed with the Court, the Clerk shall enter an order extending time for filing to not later than the fourth business day prior to the scheduled meeting of creditors. If the lists, schedules and statements are not filed by said date, the Clerk shall enter an order dismissing the case.

L.B.R. 1007-1(c). Similarly, under Bankruptcy Rule 1007(a)(4), the Court may extend the deadline to the list of equity security holders for cause shown.

10. Due to the complexity and diversity of their operations, the Debtors will be unable to complete their Schedules, SOFAs by the deadline. Given the

substantial burdens already imposed on the Debtors' management by the commencement of these chapter 11 cases, the limited number of employees available to collect the information, the competing demands upon such employees, and the time and attention the Debtors must devote to the restructuring process the Debtors submit that "cause" exists to extend the Schedules Deadline by 35 days, through and including December 30, 2008. The requested extension and waiver will enhance the accuracy of the Debtors' Schedules, SOFAs and Equity List and avoid the necessity of substantial subsequent amendments.

11. This Court and other Courts have granted the similar or longer relief in other large chapter 11 cases. See, e.g., In re Movie Gallery, Inc., Case No. 07-33849 (DOT) (Bankr. E.D. Va. Oct. 16, 2007) (granting 30-day extension); In re The Rowe Companies, Case No. 06-11142 (SSM) (Bankr. E.D. Va. Sept. 19, 2006) (granting 15-day extension); see also In re Calpine Corp., Case No. 05-60200 (Bankr. S.D.N.Y. Dec. 21, 2005) (granting 60-day extension).

WAIVER OF MEMORANDUM OF LAW

12. Pursuant to Local Bankruptcy Rule 9013-1(G), and because there are no novel issues of law presented in the Motion and all applicable authority is set forth in the Motion, the Debtors request that the requirement that all motions be accompanied by a separate memorandum of law be waived.

NO PRIOR REQUEST

13. No previous request for the relief sought herein has been made to this Court or any other court.

CONCLUSION

WHEREFORE, the Debtors respectfully request that the Court enter an order, substantially in the form annexed hereto, granting the relief requested in the Motion and such other and further relief as may be just and proper.

Dated: November 12, 2008
Richmond, Virginia

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Circuit City Stores, Inc.,	:	Case No. 08-35653 (KRH)
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	:	
Debtors.	:	Jointly Administered
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ORDER GRANTING MOTION OF THE DEBTORS FOR ORDER PURSUANT
 TO BANKRUPTCY 1007(C) AND LOCAL BANKRUPTCY RULE 1007-1
 EXTENDING TIME FOR DEBTORS TO FILE THEIR SCHEDULES AND
 STATEMENT OF FINANCIAL AFFAIRS AND LIST OF EQUITY
 SECURITY HOLDERS

Upon the motion (the "Motion")¹ of the Debtors² for an order, pursuant to Bankruptcy Rules 1007(a) and (c) and Local Bankruptcy Rule 1007-1, extending the deadline by which the Debtors must file their Schedules, SOFAs, and Equity List through and including December 30, 2008; and the Court having reviewed the Motion and the Besanko Declaration; and the Court having determined that the relief requested in the Motion is in the best interests of the Debtors, their estates, their creditors, and other parties in interest; and it appearing that proper and adequate notice of the Motion has been given and that no other or further notice is necessary; and upon the record herein; and after due deliberation

¹ The Debtors and the last four digits of their respective taxpayer identification numbers are as follows: Circuit City Stores, Inc. (3875), Circuit City Stores West Coast, Inc. (0785), InterTAN, Inc. (0875), Ventoux International, Inc. (1838), Circuit City Purchasing Company, LLC (5170), CC Aviation, LLC (0841), CC Distribution Company of Virginia, Inc. (2821), Circuit City Properties, LLC (3353), Kinzer Technology, LLC (2157), Abbott Advertising Agency, Inc. (4659), Patapsco Designs, Inc. (6796), Sky Venture Corp. (0311), Prahs, Inc. (n/a), XSStuff, LLC (9263), Mayland MN, LLC (6116), Courchevel, LLC (n/a), Orbyx Electronics, LLC (3360), and Circuit City Stores PR, LLC (5512). The address for Circuit City Stores West Coast, Inc. is 9250 Sheridan Boulevard, Westminster, Colorado 80031. For all other Debtors, the address is 9950 Mayland Drive, Richmond, Virginia 23233.

² Capitalized terms not otherwise defined herein shall have the meanings ascribed to such terms in the Motion.

thereon; and good and sufficient cause appearing therefor, it is hereby

ORDERED, ADJUDGED AND DECREED that:

1. The Motion is GRANTED as provided herein.
2. The time by which the Debtors must file their Schedules, SOFAs and Equity List shall be and hereby is extended through and including December 30, 2008, without prejudice to the Debtors' right to seek an additional extension.
3. The requirement under Local Bankruptcy Rule 9013-1(G) to file a memorandum of law in connection with the Motion is hereby waived.
4. The Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation or interpretation of this Order.

Dated: Richmond, Virginia
November __, 2008

HONORABLE KEVIN R. HUENNEKENS

WE ASK FOR THIS:

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LOCAL BANKRUPTCY RULE 9022-1(C) CERTIFICATION

Pursuant to Local Bankruptcy Rule 9022-1(C), I
hereby certify that the foregoing proposed order has
been endorsed by or served upon all necessary parties.

/s/ Douglas M. Foley